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5 SAN HUN PARK
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION
11

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 SANG HUN PARK

16 Defendant.
17
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No.: CR 05-00447 CRB

**STIPULATION AND ORDER RE
MODIFICATION OF CONDITIONS
OF RELEASE WITH
DECLARATION IN SUPPORT
THEREOF**

19 The parties hereby stipulate that the following condition of release be modified: That
20 defendant be permitted to travel to the town of Santa Maria, California to establish a new residence
21 for him and his family. The defendant has secured employment in Santa Maria, California at the
22 Mikado Restaurant, 209 Town Center, West Santa Maria, California 93454. It is further stipulated
23 that the defendant's curfew condition of release shall be deleted. Defendant is ordered to maintain
24 telephone contact with United States Pretrial Services as required by that agency. The defendant will
25 travel to Santa Maria, California on January 26, 2007.
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1 DATED: January 24, 2007

/S/
PETER AXELROD
Assistant United States Attorney

4 DATED: January 24, 2007

/
MICHAEL GAINES
Attorney for SANG HUN PARK

6 I hereby attest that I have on file all holographic signatures for any signatures indicated by a
7 "conformed" signature (/S/) within this e-filed document

/
MICHAEL GAINES
Attorney for SANG HUN PARK

DECLARATION OF COUNSEL

I, MICHAEL GAINES, declare as follows:

I am an attorney licensed to practice law in the State of California and the attorney retained to represent defendant SANG HUN PARK.

That I have been informed that Mr. PARK has received an offer of employment by the Mikado Restaurant, a Japanese / sushi restaurant located at 209 Town Center, West Santa Maria, California 93454, telephone (805) 928-1455. He has been offered the position of manager of the business. In order to secure this position, it is necessary for Mr. PARK to move with his wife and two children to the town of Santa Maria from his current residence in San Francisco, California.

I have discussed this development with Mr. PARK's United States Pretrial Services Officer, Michelle Nero, and she is in accord with the move. She has asked that the condition of curfew be deleted from Mr. PARK's release conditions. Furthermore, she would require Mr. PARK to maintain telephone contact with the United States Pretrial Office on a daily basis while he is in the process of commencing his job and finding a home for him and his family.

I have spoken with Assistant United States Attorney Peter Axelrod, who has no objection to the proposed modification. Pretrial Services Officer Michelle Nero also has no objection to the proposed modification.

I declare under penalty of perjury that the foregoing is true and correct, except as to those matters stated on information and belief and as to those matters, I believe them to be true.

Executed this 24rd day of January, 2007, at San Francisco, California.



MICHAEL GAINES
Attorney for Defendant
SANG HUN PARK

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SANG HUN PARK,

Defendants.

No. CR 05-00447 CRB

ORDER

GOOD CAUSE APPEARING, the following condition of release be modified from SANG HUN PARK's release conditions: That defendant be permitted to relocate his residence to the town of Santa Maria, California in light of his employment at the Mikado Restaurant, 209 Town Center, West Santa Maria, California 93454. The defendant will leave San Francisco for Santa Maria on January 26, 2007 for this purpose. The condition of curfew is ordered deleted from his release conditions. He is further ordered to maintain telephone contact with United States Pretrial Services on a daily basis until he secures his residence, and thereafter as required by United States Pretrial Services.

IT IS SO ORDERED.

DATED: January 25, 2007

